

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

MICHAEL GONIDAKIS, et al.,
Plaintiffs,

v.

FRANK LAROSE, in his official capacity,
Defendant,

and

SENATOR VERNON SYKES and HOUSE
MINORITY LEADER C. ALLISON RUSSO, in
their capacities as members of the Ohio
Redistricting Commission,
*Intervenors-
Defendants.*

Case No. 2:22-cv-773

Chief Judge Algenon L. Marbley

Circuit Judge Amul R. Thapar

Judge Benjamin J. Beaton

(Three-Judge District Court)

**INITIAL DISCLOSURE OF WITNESSES
FOR THE PRELIMINARY INJUNCTION HEARING**

In accordance with the Court's March 28, 2022 Order (Doc. 115), Intervenors-Defendants Senator Vernon Sykes and House Minority Leader C. Allison Russo, in their capacities as members of the Ohio Redistricting Commission, hereby provide the following initial disclosure of witnesses they reserve the right to call at the March 30, 2022 Preliminary Injunction Hearing.

1. Amanda M. Grandjean
Deputy Assistant Secretary of State and State Elections Director

Ms. Grandjean is expected to testify about the content of her March 22 and March 28 submissions to the Court. *See* Docs. 88-1 & 113-1.

2. Chris Glassburn
President of Project Govern

Mr. Glassburn is expected to testify about his personal knowledge of the Ohio Redistricting Commission's mapmaking processes and procedures beginning on January 16, 2022; the plans drafted by the Ohio Redistricting Commission's independent mapmakers; and the plan adopted by the Commission on March 28, 2022. Mr. Glassburn may also offer expert opinion testimony concerning the compliance of these plans with Ohio law.

Respectfully submitted,

/s/ C. Benjamin Cooper

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Senator Vernon Sykes and House Minority

Leader C. Allison Russo

CERTIFICATE OF SERVICE

I certify that on March 29, 2022, I filed this notice through this Court's CM/ECF system. All participants in this case are registered CM/ECF users and will be served by the CM/ECF system.

/s/ C. Benjamin Cooper
C. Benjamin Cooper